

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE MIDDLE DISTRICT OF PENNSYLVANIA**

<b>IN RE:</b>	:	<b>CHAPTER 13</b>
<b>ENRICO VAIL SMITH</b>	:	
<b>Debtor</b>	:	<b>CASE NO. 1:17-bk-02784</b>
	:	
	:	
	:	

**MOTION TO MODIFY PLAN**

COMES NOW the Debtor, by and through Kara K. Gendron, Esquire of Mott & Gendron Law, and moves to amend the Chapter 13 Plan, respectfully stating in support thereof as follows:

1. The Debtor filed a Chapter 13 Bankruptcy Petition on July 5, 2017.
2. The Debtor seeks to surrender a vehicle, amend the plan accordingly and pay attorney fees through the amended plan.

WHEREFORE, the Debtor moves to modify the plan as provided in the Amended Plan.

Respectfully submitted,

/s/ Kara K. Gendron

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	:	
	:	

**ORDER**

UPON CONSIDERATION of the Motion to Modify Plan, and cause appearing therefore,  
it is hereby

ORDERED AND DECREED that the Debtor is granted leave to Modify the Chapter 13  
Plan and the Plan is hereby modified.